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April 20, 2021

VIA ECF

Hon. Edgardo Ramos, USDJ
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Star Magic, Inc. v. Tangle, Inc., et al.
Civil Action No. 1:21-cv-00917-ER
Response to Letter Motion for Conference

Hon. Judge Ramos:

Defendants Tangle, Inc., Richard Zawitz, Nicholas Zawitz, and Joclynn Alioto (“Defendants”) submit this letter as ordered by the Court.

On April 1, 2021, Defendants filed a Motion To Stay, Transfer, Or Dismiss for Forum Non Conveniens or Another Action Pending and Motion To Dismiss For Lack of Personal Jurisdiction.

On April 6, 2021, Counsel for Star Magic, Justin E. Proper of White and Williams LLP, requested leave to file a motion to withdraw on the ground that its client has failed to pay outstanding legal bills and divergence of view on litigation strategy.

On April 16, 2021, the Court issued the following docket order: “ORDER granting [16] Letter Motion for Conference re: [16] LETTER MOTION for Conference and Extension addressed to Judge Edgardo Ramos from Justin E. Proper dated 04/06/21. A telephonic pre-motion conference will be held on April 29, 2021 at 11:00 a.m. Defendant is directed to file a written response not longer than 3 pages by April 22, 2021. Plaintiff’s time to respond to the motion to dismiss is stayed. A new deadline will be set at the conference. (HEREBY ORDERED by Judge Edgardo Ramos)(Text Only Order) (jar).”

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Defendants do not oppose Counsel's motion and do not oppose providing a reasonable amount of time for Star Magic to file a brief in opposition to Defendants' pending Motion.

Respectfully submitted,
LOSCH EHRLICH & MEYER

/s/ Joseph Ehrlich

Joseph Ehrlich

cc: Justin E. Proper, Esq. (via ECF and email)